

1 HEATHER E. WILLIAMS, SBN 122664
2 Federal Defender
3 HOOTAN BAIGMOHAMMADI, SBN 279105
4 Assistant Federal Defender
5 Designated Counsel for Service
6 801 I Street, Third Floor
7 Sacramento, CA 95814
8 T: (916) 498-5700
9 F: (916) 498-5710

10 Attorneys for Defendant
11 Mr. Kinney

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:23cr318-TLN
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO MODIFY**
18 JOSEPH PAUL HERRERA) **CONDITIONS OF RELEASE**
19 KINNEY,)
20 Defendant.) Judge: Hon. Carolyn K. Delaney

21 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
22 Phillip A. Talbert, through Assistant United States Attorney Justin Lee, counsel for Plaintiff, and
23 Federal Defender Heather Williams, through Assistant Federal Defender Hootan
24 Baigmoammadi, counsel for Defendant Joseph Paul Herrera Kinney, that the amended special
25 conditions of bond be modified.

26 The parties specifically stipulate as follows:

27 1. Mr. Kinney is on pretrial release and his amended special conditions of release
28 restrict him to home detention. ECF no. 30 at ¶ 16.

2. Mr. Kinney moves for special condition #16 to be amended by replacing home
detention with a curfew that includes the following details.

26 ***CURFEW: You must remain inside your residence every day from 10:00pm to 6:00am,
27 or as adjusted by the pretrial services officer for medical, religious services, employment
28 or court-ordered obligations.***

3. All other conditions shall remain as previously imposed.
4. A copy of the special conditions that incorporate the curfew amendment is attached as Exhibit A.
5. The government and pretrial services do not object to Mr. Kinney's motion.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: August 8, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Kinney

Date: August 8, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Justin Lee
JUSTIN LEE
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: August 9, 2024

Carolyn K. Delaney
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE